

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In re

PAKIE VINCENT PLASTINO,

Debtor.

Case No. 17-11760-MLB

RONALD G. BROWN, solely in his capacity  
as Chapter 7 Trustee for Pakie Vincent  
Plastino,

Plaintiff,

and

JAMES RIGBY, solely in his capacity as  
Chapter 7 Trustee of the Bankruptcy of Debra  
L. Wilson,

Plaintiff,

vs.

DEUTSCHE BANK NATIONAL TRUST  
COMPANY AS INDENTURE TRUSTEE  
FOR IMPAC REAL ESTATE ASSET  
TRUST SERIES 2006-SD1,

Defendant.

Adversary Proceeding No. 20-01012-MLB  
(Consolidated with Adversary Proceeding  
No. 20-01013)

NOTICE OF APPEAL AND  
STATEMENT OF ELECTION

1 I. APPELLANTS

2 1. Ronald G. Brown, solely in his capacity as the chapter 7 trustee for the  
3 bankruptcy estate of Pakie Vincent Plastino.

4 2. James Rigby, solely in his capacity as the Chapter 7 trustee for the  
5 bankruptcy estate of Debra L. Wilson.

6 3. Appellant Ronald G. Brown is the plaintiff in adversary proceeding  
7 number 20-01012.

8 4. Appellant James Rigby is the plaintiff in adversary proceeding number  
9 20-01013, consolidated under adversary proceeding number 20-01012 on April 6, 2020.

10 II. SUBJECT OF APPEAL

11 5. Plaintiffs Brown and Rigby are appealing from the Memorandum  
12 Decision [Dkt. # 42], entered December 29, 2020.

13 III. OTHER PARTIES TO APPEAL

14 6. Deutsche Bank National Trust Company, as Indenture Trustee for Impac  
15 Real Estate Asset Trust Series 2006-SD1.

16 7. Hugh McCullough and Fred Burnside, attorneys with Davis Wright  
17 Tremaine LLP, as counsel for Deutsche Bank National Trust Company, as Indenture Trustee for  
18 Impac Real Estate Asset Trust Series 2006-SD1.

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1 IV. OPTIONAL ELECTION TO HAVE APPEAL HEARD BY DISTRICT COURT

2 8. Appellants elect to have the appeal heard by the United States District  
3 Court rather than by the Bankruptcy Appellate Panel.

4 DATED this 11th day of January, 2021.

5 GROSHONG LAW PLLC

WOOD & JONES, P.S.

6  
7 /s/ Geoffrey Groshong

8 Geoffrey Groshong  
WSB No. 6124

/s/ Denice E. Moewes (per e-mail dated 1.11.2021)

Denice E. Moewes  
WSB No. 19464

9 Counsel for Ronald G. Brown  
10 Appellant

Co-counsel for James Rigby  
Appellant

11 SCHWEET, LINDE, & COULSON, PLLC

12  
13 /s/ Thomas S. Linde (per e-mail dated 1.11.2021)

14 Thomas L. Linde  
WSB No. 14426

15 Co-counsel for James Rigby  
16 Appellant